

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Debtor.

Bky. Case No.: 24-30167
Chapter 7

NOTICE OF MOTION AND MOTION FOR SALE OF PROPERTY

Erik A. Ahlgren, the bankruptcy Trustee in this case, respectfully requests that the Court approve the sale of the following described property fully owned by the bankruptcy estate.

- 2022 ABU BD BUMPER DUMP 08216BD270, VIN 4UGFD1623ND039229
- 2021 LOAD CH8320072 32978, VIN 4ZECH2026M1227692
- 2019 ROADCLIPPER DUMP TRAILER LPD207 14X82, VIN 46UFU1428K1217882
- 2019 MAXHD G8X8326 GRAVITY TILT, VIN 598BC2622KM059804
- 2016 MARK LINE INDS. BUMPER HITCH 8X28 OFFICE, VIN IN04082
- 2013 UNITED ENCLOSED, VIN 56JTE2424DA131842
- 2012 PJ DECKOVER, VIN 4P5F82224C1174607
- 2011 UNITED BUMPER HITCH, VIN 48BTE1627BA120233
- 2010 MARK LINE OFFICE TRAILER, VIN IN037324
- 2001 LOADMASTER BUMPER HITCH, VIN 4JLUB12164G2M6017
- 2017 BOBCAT COMPACT TRACK LOADER, VIN AT6313558
- 2017 BOBCAT T650 TRACK LOADER BLJG22838, VIN ALJG22838
- 2008 MEC 3772 RT MAN LIFT, VIN 9301218
- 2005 SKYTRAK TELESCOPIC LIFT, VIN 1602011274
- 2005 GENIE S-54 TELESCOPIC, VIN S45058614
- 2002 KOMATSU HYDRAULIC EXCAVATOR, VIN 15604
- 2021 HRML M210RB, VIN 5SFNB2226ME468816
- 2021 HRML M210RB, VIN 5SFNB2228ME468820
- 2021 HRML M210RB, VIN 5SFNB2223ME468773

Dagger Machinery will auction the items listed above by online auction starting on **November 5, 2024 at 5 pm and ending on November 13, 2024. The auction sale will be run on the internet site auction time.com.** This sale is as is and where is, without any representations or warranties and is subject to any existing liens and encumbrances, which the trustee believes there to be none at this time. The Trustee believes that the sale is in the best interest of the estate.

Therefore the trustee respectfully requests that the Court issue an Order authorizing the trustee to sell the above-listed property. The trustee also respectfully requests the Court that he be permitted to pay Dagger Machinery auctioneer, the fees and costs of the sale at the conclusion of the sale. The trustee shall file a Report of Sale upon completion of the auction sale.

The Trustee requests that the stay pursuant to Bankruptcy Rule 6004(h) be waived and shall not apply to this sale.

NOTICE OF MOTION: Your rights may be affected in this action. You should read these papers carefully and discuss the matters with your attorney if you have one. Any objections to this motion must be made within 21 days of this date with an original filed with the Clerk of Bankruptcy Court and copies served upon the Bankruptcy Trustee and United States Trustee at the addresses stated below. Failure to timely respond to this motion will be deemed a waiver of any objections and the Court will grant such relief as it deems appropriate.

Clerk, U.S. Bankruptcy Court
Quentin N. Burdick U.S. Courthouse
655 First Ave. N. – Suite 210
Fargo, ND 58107-4932

United States Trustee
314 South Main Ave.
Suite 303
Sioux Falls, SD 57104-6462

Trustee
(See
address
below)

DATE OF MAILING: October 14, 2024

/s/ Erik A. Ahlgren
Erik A. Ahlgren, Trustee
220 W Washington Ave Ste 105
Fergus Falls MN 56537
218-998-2775
erik@ahlgrenlaw.net

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Kari Elizabeth Plantz,

Debtor.

Chapter 7

Case No. 20-30232

UNSWORN CERTIFICATE OF SERVICE

I, Lisa Ahlgren, declare under penalty of perjury that on November 29, 2017 she caused to be served the following documents via the CM/ECF system to those parties requesting electronic notification.

1. Notice of Motion and Motion to Sell Real Property

And by U.S. Mail to: see attached matrix

McM, Inc
c/o Jon Brakke, Vogel Law Firm
218 NP Avenue
PO Box 1389
Fargo ND 58107

Dated: October 14, 2024

Signed: /e/Lisa Ahlgren
Lisa Ahlgren
220 W. Washington Ave, Ste 105
Fergus Falls, MN 56537